

The Honorable Mary Alice Theiler

UNITED STATES DISTRICT COURT FOR THE  
WESTERN DISTRICT OF WASHINGTON  
AT SEATTLE

UNITED STATES OF AMERICA,  
Plaintiff,  
v.  
CARLOS ROMALLIS DANIELS,  
Defendant.

NO. MJ21-202

## **COMPLAINT FOR VIOLATION**

Title 18, United States Code,  
Section 922(g)(1)

Before Mary Alice Theiler, United States Magistrate Judge, U.S. Courthouse,  
Seattle, Washington.

The undersigned complainant being duly sworn states:

## COUNT 1

## **(Felon in Possession of a Firearm)**

On or about April 7, 2021, at Bellevue, Washington, within the Western District of Washington, CARLOS ROMALLIS DANIELS, knowing he had previously been convicted of crimes punishable by imprisonment for a term exceeding one year, to wit:

- a. *Possession with Intent to Distribute Cocaine and Felon in Possession of a Firearm*, on or about October 19, 2007, in the United States District Court for the Western District of Washington, Case No. CR06-5350 RBL.

1 did knowingly possess, and did aid and abet the possession of, in and affecting interstate  
2 and foreign commerce, firearms, that is, a Beretta Model Px4 Storm, 40 caliber pistol,  
3 with serial number PZ31605, which had been shipped and transported in interstate and  
4 foreign commerce.

5 All in violation of Title 18, United States Code, Sections 922(g)(1) and 2.  
6

7 And the complainant states that this Complaint is based on the following  
8 information:

9 I, SHAWNA MCCANN, being first duly sworn on oath, depose and say:

10 **I. INTRODUCTION AND AGENT BACKGROUND**

11 1. I am employed as a Special Agent (SA) with the Federal Bureau of  
12 Investigation (FBI) and have been employed with the FBI since September 2017. I am  
13 currently assigned to the Seattle Field Division where I am a member of the violent  
14 crime, gang, and Transnational Organized Crime – Western Hemisphere squad. In this  
15 capacity, I investigate, inter alia, violations of the Controlled Substance Act, Title 21,  
16 United States Code, Section 801 et seq., and related offenses. I have received specialized  
17 training in the enforcement and investigation of the Controlled Substance Act. I have  
18 received over 400 hours of classroom training including, but not limited to, drug  
19 identification, drug interdiction, money laundering techniques and schemes, smuggling,  
20 and the investigation of individuals and/or organizations involved in the illegal  
21 possession, possession for sale, sales, importation, smuggling, manufacturing, and  
22 trafficking of controlled substances.

23 2. In my role as a Special Agent for the FBI, I have participated in narcotics  
24 investigations (e.g., heroin, cocaine, marijuana, and methamphetamine) that have resulted  
25 in the arrest of individuals and the seizure of illicit narcotics and/or narcotics-related  
26 evidence and the forfeiture of narcotics-related assets. I have been involved in the service  
27 of federal and state search warrants as part of these investigations. I have encountered  
28 and have become familiar with various tools, methods, trends, paraphernalia, and related

1 articles utilized by various traffickers in their efforts to import, export, conceal, and  
2 distribute controlled substances. I am also familiar with the manner in which drug  
3 traffickers use telephones, often cellular telephones, to conduct their unlawful operations,  
4 and how they code their conversations to disguise their unlawful activities. I am also  
5 familiar with the various methods of packaging, delivering, transferring, and laundering  
6 drug proceeds. Additionally, through my training and experience, I can identify illegal  
7 drugs by sight, odor, and texture.

8       3. I have also worked on drug investigations involving the use of court-  
9 authorized wiretaps under Title III. In that capacity, I have had the opportunity to  
10 monitor, listen to, and review transcripts and line sheets (prepared by linguists)  
11 documenting the content of hundreds of intercepted conversations involving the  
12 trafficking of cocaine, methamphetamine, heroin, and other narcotics, by persons who  
13 used some form of code to attempt to thwart law enforcement detection. I have also  
14 interviewed defendants at the time of their arrest and have debriefed, spoken with, and/or  
15 interviewed numerous drug dealers or confidential sources (informants) at proffer and  
16 field interviews who were experienced in speaking in coded conversation over the  
17 telephone. From these interviews, and also from discussions with other experienced  
18 agents, I have gained knowledge regarding the various methods, techniques, codes,  
19 and/or jargon used by drug traffickers in the course of their criminal activities, including  
20 their use of firearms to protect their narcotics-related activities and of cellular telephones  
21 and other electronic means to facilitate communications while avoiding law enforcement  
22 scrutiny.

23       4. I have written affidavits in support of court-authorized federal warrants and  
24 orders in the Western District of Washington for GPS tracking of telephones, Pen  
25 Register/Trap and Trace, and search warrants. Additionally, I have testified in grand jury  
26 proceedings, written investigative reports, and conducted and participated in numerous  
27 interviews of drug traffickers of various roles within drug organizations, which has  
28

1 provided me with a greater understanding of the methods by which drug trafficking  
2 organizations operate.

3       5. I am an investigative law enforcement officer of the United States within  
4 the meaning of 18 U.S.C. § 2510(7). As such, I am empowered to conduct investigations  
5 of, and to make arrests for, violations of the Controlled Substance Act, Title 21, United  
6 States Code, Section 801 *et seq.*, and related offenses.

7       6. The facts set forth in this Affidavit are based on my own personal  
8 knowledge; knowledge obtained from other individuals during my participation in this  
9 investigation, including other law enforcement personnel; review of documents and  
10 records related to this investigation; communications with others who have personal  
11 knowledge of the events and circumstances described herein; and information gained  
12 through my training and experience. Because this Affidavit is submitted for the limited  
13 purpose of establishing probable cause to believe that Defendant committed the crime set  
14 forth herein, this document does not contain all of my knowledge of the larger  
15 investigation.

## 16           **II. PURPOSE OF AFFIDAVIT**

17       7. This Affidavit is made in support of a Complaint against CARLOS  
18 ROMALLIS DANIELS for one count of *Felon in Possession of a Firearm*, in violation  
19 of Title 18, United States Code, Sections 2, 922(g)(1).

## 20           **III. SUMMARY OF PROBABLE CAUSE**

21       8. I, together with other agents and officers of the FBI, the Seattle Police  
22 Department (SPD), and other agencies have been conducting an investigation of a large  
23 Drug Trafficking Organization (DTO) which was believed to be distributing significant  
24 amounts of cocaine, crack cocaine, marijuana, and other controlled substances in the  
25 Western District of Washington. During the course of the investigation, law enforcement  
26 obtained judicial authorization to intercept a number of cellular telephones used by  
27 members of the DTO.

1       9. On March 31, 2021, agents obtained search warrants for multiple locations,  
 2 vehicles, and individuals in connection with this investigation. These warrants included  
 3 search warrants for a location in Bellevue, Washington where DANIELS resides, three  
 4 search warrants for vehicles associated with DANIELS, and one search warrant for  
 5 DANIELS' person.

6       10. On April 7, 2021, the FBI and other law enforcement agencies executed the  
 7 search warrants described above. At a condominium unit in the Bellevue South Tower  
 8 on NE 4th Street, in Bellevue, Washington, agents found DANIELS. When agents  
 9 entered the unit, they observed DANIELS coming out of the unit's master bedroom. No  
 10 one else was present in the unit. In a nightstand next to the bed in the master bedroom,  
 11 agents found thousands of dollars in cash and a Beretta Model Px4 Storm, 40 caliber  
 12 pistol, with serial number PZ31605. In the master bedroom, agents also found  
 13 DANIELS' driver's license and dozens of credit cards in his name.

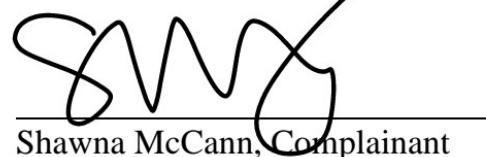
14      11. I have examined the National Crime Information Center criminal history  
 15 for DANIELS and certified court documents, and I have been able to confirm that  
 16 DANIELS has been convicted of the following felony crime as an adult, among others  
 17 not detailed here: *Possession with Intent to Distribute Cocaine and Felon in Possession*  
 18 *of a Firearm*, on or about October 19, 2007, in the United States District Court for the  
 19 Western District of Washington, Case No. CR06-5350 RBL. Both of these crimes were  
 20 punishable by a term of imprisonment exceeding one year, and DANIELS received a  
 21 sentence of 168 months. On December 5, 2014, DANIELS' sentence for these crimes  
 22 was reduced to 135 months.

23      12. ATF Special Agent Catherine Cole, a certified Interstate Firearms and  
 24 Ammunition Nexus Expert, who has been trained in the recognition of firearms and  
 25 ammunition and their origin of manufacture, has reviewed photographs of the firearm and  
 26 had the firearm described to her by agents at the residence during the time of the search,  
 27 including information regarding the manufacturer, model, and serial number. According  
 28 to SA Cole, the firearm meets the federal definition of a firearm, and the firearm was not

1 manufactured in the State of Washington. Therefore, because the firearm was recovered  
2 in this District, the firearm was necessarily shipped or transported in interstate or foreign  
3 commerce.

4 **IV. CONCLUSION**

5 13. Based on the above facts, I respectfully submit that there is probable cause  
6 to believe that CARLOS ROMALLIS DANIELS did knowingly and intentionally  
7 commit the crime of *Felon in Possession of a Firearm*, in violation of Title 18, United  
8 States Code, Sections 922(g)(1) and 2.

9  
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11   
Shawna McCann, Complainant  
12 Special Agent, FBI

13 Based on the Complaint and Affidavit, to which the above-named agent provided  
14 a sworn statement by telephone attesting to the truth of the contents of such, the Court  
15 hereby finds that there is probable cause to believe the Defendant committed the offense  
16 set forth in the Complaint.

17 Dated this 7th day of April, 2021.  
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The Honorable Mary Alice Theiler  
21 United States Magistrate Judge  
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